## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN SECTION OF TENNESSEE WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D.
BROWN, DEONTAE TATE, JEREMY S.
MELTON, ESTATE OF ISSACCA
POWELL, KEITH BURGESS, TRAVIS
BOYD, and TERRENCE DRAIN, and
KIMBERLY ALLEN, on behalf of
themselves and all similarly situated
persons,

Case No. 2:16-cv-2907-SHM/tmp

Plaintiffs,

V.

BILL OLDHAM, in his individual capacity and in his official capacity as the Sheriff of Shelby County, Tennessee; FLOYD BONNER, JR., in his official capacity as Sheriff of Shelby County, Tennessee; ROBERT MOORE, in his individual capacity and in his official capacity as the Jail Director of the Shelby County, Tennessee; KIRK FIELDS, in his official capacity as Jail Director of Shelby County, Tennessee, CHARLENE MCGHEE; in her individual capacity and in her official capacity as the of Assistant Chief Jail Security of Shelby County, Tennessee; REGINALD HUBABARD, in his official capacity as Assistant Chief of Jail Security of Shelby County, Tennessee; DEBRA HAMMONS, in her individual capacity and in her official capacity as the Assistant Chief of Jail Programs of Shelby County, Tennessee; TIFFANY WARD in her capacity as Assistant Chief of Jail Programs of Shelby County, Tennessee, SHELBY COUNTY, TENNESSEE, a Tennessee municipality; TYLER TECHNOLOGIES, INC., a foreign corporation; GLOBAL TEL\*LINK CORPORATION, a foreign corporation; SOFTWARE AG USA, INC.,

a foreign corporation; and SIERRA SYSTEMS GROUP, INC., a foreign corporation; and TETRUS CORP, a foreign corporation,

DEFENDANTS.

## NOTICE OF SERVICE OF PLAINTIFFS' RESPONSES AND OBJECTIONS TO CONTRACTOR DEFENDANTS' FIRST SET OF CLASS CERTIFICATION INTERROGATORIES

COME NOW Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen on behalf themselves and all similarly situated persons (hereinafter "the Plaintiffs"), by and through the undersigned counsel, and simultaneously therewith, forwarded to the Defendants, via internet delivery, and via U.S. Regular Mail, postate paid, *Plaintiffs' Responses and Objections to Contractor Defendants' First Set of Class Certification Interrogatories*.

Respectfully submitted,

## /s/ Brice M. Timmons

Michael G. McLaren (#5100)
William E. Cochran, Jr. (#21428)
Brice M. Timmons (#29582)
BLACK McLaren Jones Ryland & Griffee PC 530 Oak Court Drive, Suite 360
Memphis, TN 38117
(901) 762-0535 (Office)
(901) 762-0539 (Fax)
weochran@blackmclaw.com

Frank L. Watson, III (Tenn. Bar No. 15073) William F. Burns (Tenn. Bar No. 17908) WATSON BURNS, PLLC 253 Adams Avenue Memphis, Tennessee 38104 Phone: (901) 529-7996

Phone: (901) 529-7996 Fax: (901) 529-7998

Email: fwatson@watsonburns.com

Email: bburns@watsonburns.com

Claiborne Ferguson (Tenn. Bar No. 20457) Attorney for Plaintiffs and the Class THE CLAIBORNE FERGUSON LAW FIRM P.A. 294 Washington Avenue Memphis, Tennesseee 38103 Claiborne@midsouthcriminaldefense.com

Joseph S. Ozment (Tenn. Bar No. 15601) THE LAW OFFICE OF JOSEPH S. OZMENT, PLLC 1448 Madison Ave.

Memphis, Tennessee 38104

Phone: (901) 525-4357 Email: jozment@oz-law.net

Counsel for Plaintiffs and the putative Class

Members

## **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing has been filed via the Court's ECF system this 18th day of June, 2020, for service on all persons registered in connection with this case, including:

Robert E. Craddock, Esq.
Odell Horton, Jr., Esq.
Amber D. Floyd, Esq.
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Drive, Suite
800

Memphis, Tennessee 38120 (901) 537-1000

Email: rcraddock@wyattfirm.com Email: ohorton@wyattfirm.com Email: afloyd@wyattfirm.com

Emmett Lee Whitwell, Esq.
SHELBY COUNTY ATTORNEY'S
OFFICE
160 N. Main Street
Suite 950
Memphis, TN 38103
(901)222-2100
Email:
lee.whitwell@shelbycountytn.gov

Counsel for Defendants Bill Oldham, Robert Moore, Charlene McGhee, Debra Hammons and Shelby County, Tennessee Bradley E. Trammell, Esq.
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
165 Madison Avenue
Suite 2000
Memphis, Tennessee 38103
(901) 577-2121
Email:
btrammell@bakerdonelson.com

Beth Bivans Petronio, Esq.
K&L GATES, LLP
1717 Main Street
Suite 2800
Dallas, Texas 75201
9214) 939-5815
Email: beth.petronio@klgates.com
Counsel for Defendant Tyler
Technologies, Inc

/s/ Brice M. Timmons